



Office of Environment, Safety and Health

10 CFR 851 Worker Safety & Health Program Implementation Panel Discussion

Office of Price-Anderson Enforcement (EH-6)
Phil Wilhelm, Les Bermudez, Howard Wilchins

Office of Health (EH-5)
Bill McArthur, Jackie Rogers





10 CFR 851 Overview

- ◆ **Final Rule published on February 9, 2006
Enforcement begins February 9, 2007**
- ◆ **Contractor WSH Programs due to Heads of Field Elements by February 24, 2007 (+380 days)**
- ◆ **Contractors must achieve compliance with Subpart C and their approved WSH Programs by May 25, 2007 (+470 days)**





10 CFR 851 Overview (*cont'd*)

- ◆ **Program requirements in Subpart C**
- ◆ **Standard requirements in 851.23 (includes Beryllium and Bio Safety)**
- ◆ **Functional area requirements in 851.24 and Appendix A**





Implementation Strategy

- ◆ **Develop WSH Implementation Guide**
- ◆ **Develop NTS Reporting Threshold EGS**
- ◆ **Revise Enforcement Program Plan to include WSH**
- ◆ **Provide information/data on OE website**





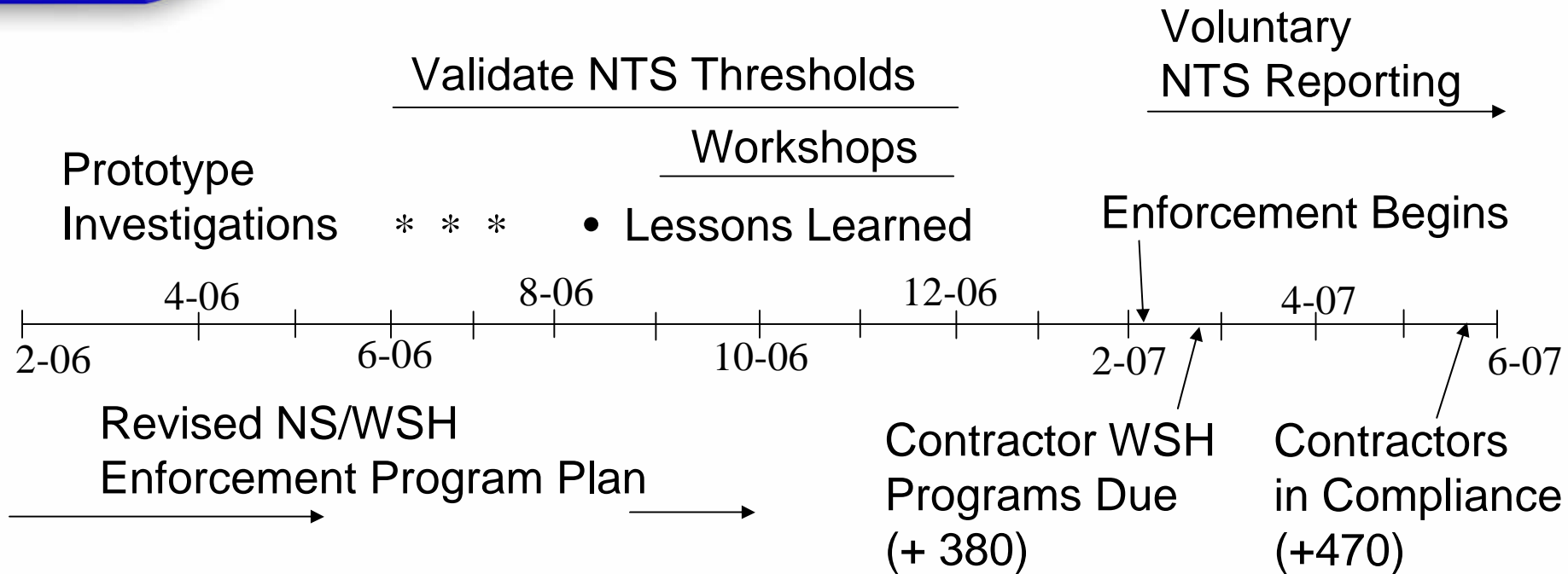
Implementation Strategy (*cont'd*)

- ◆ **Provide briefings/workshops**
- ◆ **Conduct prototype investigations**
- ◆ **Test NTS reporting of WSH noncompliances**





10 CFR 851 Enforcement Timeline





NTS Reporting Threshold

- ◆ **Programmatic deficiencies (includes repetitive and reoccurring)**
- ◆ **Willful/Falsification**
- ◆ **Fatalities/Occupational injuries and illnesses**
- ◆ **Near misses**
- ◆ **High probability serious exposures**





WSH Reporting Thresholds

Management Issues Noncompliances

- ◆ Repetitive Noncompliances
- ◆ Programmatic Issues
- ◆ Intentional Violation or Misrepresentation





WSH Reporting Thresholds

Noncompliances Associated with ORPS

- ◆ Events that result in Occupational Injuries and Illnesses
- ◆ Fire and Explosions
- ◆ Failure of Hazardous Energy Controls
- ◆ Near Miss





WSH Reporting Thresholds

Other Significant Conditions

- ◆ Conditions meeting the criteria of Severity Level I (serious) violations





EFCOG / 10CFR851 Approach

Bill Luce, PAAA Working Group
Washington Savannah River Company
DOE PAAA Meeting
April 2008



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Overview

- Approach
- Path Forward



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Approach

- EFCOG Chair & DOE HQ EH 1 Agreed to Work together on 10CFR851 Implementation
- EFCOG Board of Directors Elected to form a Separate 10CFR851 Project Team
 - Senior Leadership from EFCOG Board
 - Project Leads from ISM and PAAA WG's
- Direct Interface Established with DOE HQ Project Manager, Technical and PAAA Leads



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Approach continued

- Activities to Date Includes Providing:
 - Input on Proposed Thresholds for NTS Reporting
 - Input on Draft Implementation Guide



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Measuring what matters to measure better

Path Forward

- Provide Support for:
 - Guidance Development
 - Orientation Workshops/Meetings
 - Implementation Workshops
 - Pilot Inspections
 - Final Guidance Preparation